

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

OTO ANALYTICS, LLC,

Plaintiff,

v.

**BENWORTH CAPITAL PARTNERS PR,
LLC; BENWORTH CAPITAL PARTNERS,
LLC; BERNARDO NAVARRO and CLAUDIA
NAVARRO,**

Defendants.

Civil No. 23-01034 (GMM) *cons.*
Civil No. 24-01313 (GMM)

**FEDERAL RESERVE BANK OF SAN
FRANCISCO,**

Plaintiff-Intervenor,

v.

**OTO ANALYTICS, LLC; BENWORTH
CAPITAL PARTNERS PR, LLC;
BENWORTH CAPITAL PARTNERS, LLC;
BERNARDO NAVARRO and CLAUDIA
NAVARRO,**

Defendants in Intervention.

**FEDERAL RESERVE BANK OF SAN
FRANCISCO,**

Consolidated Plaintiff,

v.

**BENWORTH CAPITAL PARTNERS PR,
LLC; BENWORTH CAPITAL PARTNERS,
LLC; BERNARDO NAVARRO and CLAUDIA
NAVARRO,**

Consolidated Defendants.

JOINT STIPULATION TO DISMISS WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Civil Rule 41(a), Plaintiff/Defendant in Intervention Oto Analytics, LLC (f/k/a Oto Analytics, Inc. d/b/a Womply) (“**Womply**”) and Defendants Benworth Capital Partners PR, LLC, Benworth Capital Partners, LLC, Bernardo Navarro, and Claudia Navarro (collectively, “**Defendants**”), through their undersigned counsel, respectfully submit this Joint Stipulation for Dismissal With Prejudice.

WHEREAS, Womply filed this action against Defendants on January 24, 2023 (ECF No. 1);

WHEREAS, this Court denied Defendants’ motion to dismiss on October 12, 2023 (ECF No. 96);

WHEREAS, Womply filed an Amended Complaint on July 1, 2024 (ECF No. 125);

WHEREAS, Defendants answered Womply’s Amended Complaint on August 19, 2024 (ECF Nos. 149–52);

WHEREAS, this Court consolidated *Oto Analytics, LLC v. Benworth Capital Partners PR LLC, et al.*, Civil No. 23-01034 (D.P.R.) (the “**Womply Action**”) and *Federal Reserve Bank of San Francisco v. Benworth Capital Partners LLC et al.*, Civil No. 24-cv-01313 (D.P.R.) on August 20, 2024 (ECF No. 155);

WHEREAS, Womply and Defendants have reached a settlement agreement;

NOW THEREFORE, it is hereby stipulated and agreed, by and among Womply and Defendants, through their undersigned counsel, that all of Womply’s claims asserted in the Womply Action are hereby DISMISSED WITH PREJUDICE pursuant to Federal Rule of Civil Procedure Rule 41(a)(1)(A)(ii), with each party to bear its own attorneys’ fees, costs, and expenses.

Dated: January 2, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 2, 2025, the foregoing document was filed with the Clerk of the Court using CM/ECF, which sent notice to all parties receiving notifications through the CM/ECF system.

Dated: January 2, 2025

By: /s/ Alejandro J. Cepeda Diaz

Counsel for Plaintiff Oto Analytics, LLC